

Exhibit 32

**LITIGATION BEFORE THE
AMSTERDAM DISTRICT COURT**

EUROCHEM VOLGA-KALIY LLC

Plaintiff,

**Case and Cause list number:
539097 C/13 2013/378**

vs.

INTERNATIONAL MINERAL RESOURCES B.V.

Defendant

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**WITNESS STATEMENT
OF TALITA DOUGLAS**

Introduction

1. My name is Talita Douglas and I submit this witness statement in support of EuroChem Volga-Kaliy LLC ("ECVK") in its action in the Netherlands against International Mineral Resources B.V. ("IMR"), the controlling shareholder of Shaft Sinkers (Pty) Ltd. ("Shaft Sinkers").

2. I am a citizen of and reside in South Africa. My birthdate is 1972-04-13 and my current address is 38 Ebony Place, Hoogspring Street, Weltevredenpark Roodepoort.

3. I am currently the Office Administrator at MetGroup where I am responsible for managing all administrative work within the company. Prior to my employment with MetGroup, I worked at Shaft Sinkers.

4. I was hired by Shaft Sinkers in March 2008 as the Personal Assistant to Alon Davidov. It was a full-time position, and I held it until March 2010, when I moved to the Tendering Department and work there until 2013 when I was retrenched. (At that time I was not married and went by Talita Steenkamp, but remarried in March 2012.)

5. During my 2008-2010, I worked exclusively for Mr. Davidov, who was introduced to me as a non-executive director of IMR. Mr. Davidov had an executive office at Shaft Sinkers, where he worked full-time, and he travelled a lot on both Shaft Sinkers' business and separate business for IMR's business.

6. I have read the witness statements of Mr. Davidov filed in this action where he claims that he was not involved in Shaft Sinkers' business, and did not work for IMR. Both statements are simply untrue.

7. Mr. Davidov was not only very much involved in Shaft Sinkers' business from at least the time I joined in 2008 (and maybe earlier before I was hired), but he was also very



much involved in the business of IMR. Mr. Davidov himself also reported to Jai Saraf and Amre Youness, both from IMR. Both would come to South Africa for meetings with Mr. Davidov. I understood that Amre Youness decided that Mr. Davidov would become CEO of Shaft Sinkers in late 2010.

8. Mr. Davidov also maintained regular contacts with other IMR people through phone calls, letters, personal meetings in Johannesburg, Amsterdam and London. I know that because as his Personal Assistant I was responsible for meeting arrangements, itineraries of Mr. Davidov and other IMR people, conference calls, correspondence etc.

9. I have read the description of Mr. Davidov's role in the Shaft Sinkers Prospectus and its Amended Reports for 2010, 2011 and 2012, which state that "as IMR's South African representative, he was responsible for IMR's original investment in the Group in 2007 and oversight of the Group's subsequent development on behalf of IMR." I have no information about the acquisition, which happened before my time at the company, but during my work at Shaft Sinkers from March 2008 till March 2013, Mr. Davidov was definitely in charge of Shaft Sinkers as an IMR person. Myself and other PA's including Rob Schroder's PA were under the impression that Mr Davidov was a IMR's representative and working for IMR even before he became CEO in 2010.

10. Mr. Davidov was getting paid regularly by Shaft Sinkers. I was responsible for delivering Mr. Davidov's paychecks to him every month, and I found it odd that he was identified as a "Financial Consultant" when he was clearly involved in a Non Executive Director role for both Shaft Sinkers & IMR.

11. Mr. Davidov also hired personnel to fill high-lever positions such as Shaft Sinkers' Michael Levontin, whom Mr. Davidov was very close with; Leonid Vul; and Piotr Kiskurno, a friend of Mr. Davidov's who had worked for Sivi Gounden, was hired after Mr. Davidov became CEO.

12. Mr. Davidov would travel to the United Kingdom and the Netherlands for IMR board meetings and while in South Africa he would be in regular contact with IMR personnel, including their visits to Shaft Sinkers in South Africa.

13. I recall Frank Huster of IMR visited the offices from Amsterdam where IMR is headquartered and was in regular contact with Mr. Davidov. Mr. Huster also gave me assignments directly for IMR, and as part of my responsibilities at Shaft Sinkers I also managed books, correspondence and invoices for IMR in South Africa.

14. I also made travel arrangements for IMR people whenever they came to Johannesburg, which was part of my job responsibilities.

15. Walter Hall, an IMR appointed director based in the United Kingdom, came to South Africa from time to time for meeting with Mr. Davidov.

16. Dr. Sittard, who I was told was the Chairman of IMR at the time, came to South Africa occasionally for meetings, with Felix Vulis of ENRC, and met with Messrs. Davidov and Saraf to discuss Shaft Sinkers' and IMR's other business. (I remember meeting Messrs. Sittard and Vulis into Intercontinental at OR Tambo International Airport, where I had to ensure they have a room with teleconference facilities, fax machine etc. and had to ensure that everything was in place for them and only left there that evening at 19:30pm.

Messrs. Youness and Saraf usually stayed at the Michelangelo Hotel in Sandton.)

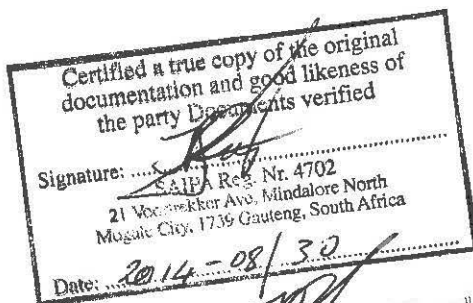
17. I recall that one of the owners of IMR, Mr. Machkevitch, also came to South Africa for meetings with Mr. Davidov. Mr. Davidov and Mr. Machkevitch appeared to be very close.


18. Regarding the ECVK project, I also remember Mr. Davidov had multiple phone calls with Alexander Skrylnikov will the project was on-going.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Date: 30 August 2014
Ruimsig, South Africa


Talita Douglas




Talita Douglas
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